

# OSS Evaluation Project Report – Test Results

Test Reference	Evaluation Criteria	Result	Comments
			<p>were subsequently restated.</p> <p>Observation 828, issued April 9, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 22 for the September 2002 data month.</p>
PMR5-2-G	SBC Ameritech-reported and BearingPoint-calculated metrics values agree for the Interconnection Trunks Measure Group.	Satisfied	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech-reported and BearingPoint-calculated metrics values agree for the Interconnection Trunks Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech-reported and BearingPoint-calculated metrics values agree for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is above the 95 percent benchmark. See Table 5-7 for additional details.</p> <p>Observation 817, issued March 6, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 73 for the August and September 2002 data months.</p> <p>Observation 824, issued March 26, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 78 for the September 2002 data month.</p>
PMR5-2-H	SBC Ameritech-reported and BearingPoint-calculated metrics values agree for the Directory Assistance/Operator Services Measure Group.	Satisfied	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech-reported and BearingPoint-calculated metrics values agree for the Directory Assistance/Operator Services Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech-reported and BearingPoint-calculated metrics values agree for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is</p>

Test Reference	Evaluation Criteria	Result	Comments
			100 percent. See Table 5-7 for additional details.
PMR5-2-I	SBC Ameritech-reported and BearingPoint-calculated metrics values agree for the Local Number Portability Measure Group.	Not Satisfied (In Retest)	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for the Local Number Portability Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech-reported and BearingPoint-calculated metrics values agree for three consecutive data months.</p> <p>The score for each of the July and August 2002 data months is below the 95 percent benchmark. See Table 5-7 for additional details.</p> <p>BearingPoint was unable to verify that SBC Ameritech-reported and BearingPoint-calculated metrics values agree for PM 95 for July and August 2002 because values posted as of February 5, 2003 were subsequently restated.</p> <p>Observation 802, issued February 13, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 92 for the July 2002 data month.</p> <p>Observation 805, issued February 13, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 96 for the July 2002 data month.</p> <p>Observation 806, issued February 13, 2003, states that SBC Ameritech-reported and BearingPoint-calculated metrics values do not agree for PM 97 for the July 2002 data month.</p> <p>Observation 843, issued May 8, 2003, states that SBC Ameritech-reported and</p>

PMR5-3-G	SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for the Interconnection Trunks Measure Group.	Indeterminate	<p>BearingPoint is still assessing the July, August, and September 2002 Performance Measurement Reports for the Interconnection Trunks Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for three consecutive data months.</p> <p>See Table 5-8 for additional details.</p>
PMR5-3-H	SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for the Directory Assistance/Operator Services Measure Group.	<del>Not Satisfied</del> <del>(In Retest)</del>	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics calculations are <del>not</del> consistent with the documented metrics calculation rules for the Directory Assistance/Operator Services Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for three consecutive data months.</p> <p><u>The score for each of the July, August, and September 2002 data months is 100 percent. See Table 5-8 for additional details.</u></p> <p><del>Seventy-six percent of the BearingPoint-calculated and SBC Ameritech-reported values do not match for each of the July, August, and September 2002 CLEC Aggregate Performance Measurement Reports for the Directory Assistance/Operator Services Measure Group. Therefore, 76 percent of the values are considered to be calculated inconsistently with the documented metrics calculation rules. See Tables 5-7 and 5-8 for additional details.</del></p>

OSS Evaluation Project Report – Test Results

PMR5-3-G	SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for the Interconnection Trunks Measure Group.	Indeterminate	<p>BearingPoint is still assessing the July, August, and September 2002 Performance Measurement Reports for the Interconnection Trunks Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for three consecutive data months.</p> <p>See Table 5-8 for additional details.</p>
PMR5-3-H	SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for the Directory Assistance/Operator Services Measure Group.	Satisfied	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for the Directory Assistance/Operator Services Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics calculations are consistent with the documented metrics calculation rules for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is 100 percent. See Table 5-8 for additional details.</p>

PMR5-4-G	SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for the Interconnection Trunks Measure Group.	Not Satisfied (In Retest)	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are not consistent with the documented metrics exclusion rules for the Interconnection Trunks Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is below the 95 percent benchmark. See Table 5-9 for additional details.</p> <p>Observation 804, issued February 13, 2003, states that SBC Ameritech's implemented metrics exclusions are not consistent with the documented metrics exclusion rules for PM 75 for the July, August, and September 2002 data months.</p>
PMR5-4-H	SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for the Directory Assistance/Operator Services Measure Group.	Not Satisfied (In Retest)	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are not consistent with the documented metrics exclusion rules for the for the Directory Assistance/Operator Services Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for three consecutive data months.</p> <p><u>The score for each of the July, August, and September 2002 data months is 100 percent. See Table 5-9 for additional details.</u></p> <p><del>Seventy-six percent of the BearingPoint-calculated and SBC Ameritech-reported values do not match for each of the July, August, and September 2002 CLEC Aggregate Performance Measurement Reports for the Directory Assistance/Operator Services Measure Group. Therefore, 76 percent of the values are considered to be calculated inconsistently with the documented metrics exclusion rules. See Tables 5-7 and 5-9 for additional details.</del></p>
PMR5-4-I	SBC Ameritech's implemented metrics	Not Satisfied	Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are

PMR5-4-G	SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for the Interconnection Trunks Measure Group.	Not Satisfied (In Retest)	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are not consistent with the documented metrics exclusion rules for the Interconnection Trunks Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is below the 95 percent benchmark. See Table 5-9 for additional details.</p> <p>Observation 804, issued February 13, 2003, states that SBC Ameritech's implemented metrics exclusions are not consistent with the documented metrics exclusion rules for PM 75 for the July, August, and September 2002 data months.</p>
PMR5-4-H	SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for the Directory Assistance/Operator Services Measure Group.	Satisfied	<p>Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for the for the Directory Assistance/Operator Services Measure Group.</p> <p>BearingPoint is using the benchmark that for 95 percent of required values, SBC Ameritech's implemented metrics exclusions are consistent with the documented metrics exclusion rules for three consecutive data months.</p> <p>The score for each of the July, August, and September 2002 data months is 100 percent. See Table 5-9 for additional details.</p>
PMR5-4-I	SBC Ameritech's implemented metrics	Not Satisfied	Based on the review of July, August, and September 2002 Performance Measurement Reports, SBC Ameritech's implemented metrics exclusions are

**Table 5-7: PMR5-2 – Scoring for Agreement of Reported and Independently Calculated Values**

Measure Groups	Months	Total Values	Values Validated	Values in Error	Score
Pre-Ordering	July 2002	592	458	15	≤97.5%
	August 2002	592	297	0	≤100%
	September 2002	592	238	0	≤100%
Ordering	July 2002	736	0	25	≤96.6%
	August 2002	736	0	25	≤96.6%
	September 2002	736	0	25	≤96.6%
Provisioning	July 2002	12,294	6,723	41	≤99.7%
	August 2002	12,294	4,321	0	≤100%
	September 2002	12,294	4,201	0	≤100%
Maintenance & Repair	July 2002	5,912	3,992	116	≤98.0%
	August 2002	5,912	2,303	0	≤100%
	September 2002	5,912	2,064	0	≤100%
Billing	July 2002	51	51	0	100%
	August 2002	51	45	6	88.2%
	September 2002	51	51	0	100%
Miscellaneous Administrative	July 2002	48	18	30	37.5%
	August 2002	48	18	30	37.5%
	September 2002	48	18	30	37.5%
Interconnection Trunks	July 2002	196	196	0	100%
	August 2002	196	196	0	100%
	September 2002	196	193	3	98.5%
Directory Assistance/Operator Services	July 2002	92	<del>2292</del>	<del>700</del>	100% <del>23.9%</del>
	August 2002	92	<del>9222</del>	<del>070</del>	100% <del>23.9%</del>

Measure Groups	Month(s)	Total Values	Values Validated	Values In Error	Score
	September 2002	92	92/22	0/70	100% <del>23.9%</del>
Local Number Portability	July 2002	72	34	17	≤76.4%
	August 2002	72	7	5	≤93.1%
	September 2002	72	5	0	≤100%
911	July 2002	40	36	3	≤92.5%
	August 2002	40	36	3	≤92.5%
	September 2002	40	36	3	≤92.5%
Poles, Conduits, and Rights-of-Way	July 2002	22	0	22	0%
	August 2002	22	13	9	59.1%
	September 2002	22	0	19	≤13.6%
Collocation	July 2002	94	94	0	100%
	August 2002	94	94	0	100%
	September 2002	94	94	0	100%
Directory Assistance Database	July 2002	20	20	0	100%
	August 2002	20	20	0	100%
	September 2002	20	20	0	100%
Coordinated Conversions	July 2002	80	60	20	75%
	August 2002	80	41	39	51.3%
	September 2002	80	65	15	81.3%
NXX	July 2002	18	12	0	≤100%
	August 2002	18	12	0	≤100%
	September 2002	18	12	0	≤100%
Bona Fide Requests	July 2002	10	10	0	100%
	August 2002	10	10	0	100%



**Table 5-7: PMR5-2 – Scoring for Agreement of Reported and Independently Calculated Values**

Measure Groups	Months	Total Values	Values Validated	Values In Error	Score
Pre-Ordering	July 2002	592	458	15	≤97.5%
	August 2002	592	297	0	≤100%
	September 2002	592	238	0	≤100%
Ordering	July 2002	736	0	25	≤96.6%
	August 2002	736	0	25	≤96.6%
	September 2002	736	0	25	≤96.6%
Provisioning	July 2002	12,294	6,723	41	≤99.7%
	August 2002	12,294	4,321	0	≤100%
	September 2002	12,294	4,201	0	≤100%
Maintenance & Repair	July 2002	5,912	3,992	116	≤98.0%
	August 2002	5,912	2,303	0	≤100%
	September 2002	5,912	2,064	0	≤100%
Billing	July 2002	51	51	0	100%
	August 2002	51	45	6	88.2%
	September 2002	51	51	0	100%
Miscellaneous Administrative	July 2002	48	18	30	37.5%
	August 2002	48	18	30	37.5%
	September 2002	48	18	30	37.5%
Interconnection Trunks	July 2002	196	196	0	100%
	August 2002	196	196	0	100%
	September 2002	196	193	3	98.5%
Directory Assistance/Operator Services	July 2002	92	92	0	100%
	August 2002	92	92	0	100%

Measure Groups	Months	Total Values	Values Validated	Values In Error	Score
	September 2002	92	92	0	100%
Local Number Portability	July 2002	72	34	17	≤76.4%
	August 2002	72	7	5	≤93.1%
	September 2002	72	5	0	≤100%
911	July 2002	40	36	3	≤92.5%
	August 2002	40	36	3	≤92.5%
	September 2002	40	36	3	≤92.5%
Poles, Conduits, and Rights-of-Way	July 2002	22	0	22	0%
	August 2002	22	13	9	59.1%
	September 2002	22	0	19	≤13.6%
Collocation	July 2002	94	94	0	100%
	August 2002	94	94	0	100%
	September 2002	94	94	0	100%
Directory Assistance Database	July 2002	20	20	0	100%
	August 2002	20	20	0	100%
	September 2002	20	20	0	100%
Coordinated Conversions	July 2002	80	60	20	75%
	August 2002	80	41	39	51.3%
	September 2002	80	65	15	81.3%
NXX	July 2002	18	12	0	≤100%
	August 2002	18	12	0	≤100%
	September 2002	18	12	0	≤100%
Bona Fide Requests	July 2002	10	10	0	100%
	August 2002	10	10	0	100%

**Table 5-7: PMR5-2 – Scoring for Agreement of Reported and Independently Calculated Values**

Measure Groups	Months	Total Values	Values Validated	Values in Error	Score
Pre-Ordering	July 2002	592	458	15	≤97.5%
	August 2002	592	297	0	≤100%
	September 2002	592	238	0	≤100%
Ordering	July 2002	736	0	25	≤96.6%
	August 2002	736	0	25	≤96.6%
	September 2002	736	0	25	≤96.6%
Provisioning	July 2002	12,294	6,723	41	≤99.7%
	August 2002	12,294	4,321	0	≤100%
	September 2002	12,294	4,201	0	≤100%
Maintenance & Repair	July 2002	5,912	3,992	116	≤98.0%
	August 2002	5,912	2,303	0	≤100%
	September 2002	5,912	2,064	0	≤100%
Billing	July 2002	51	51	0	100%
	August 2002	51	45	6	88.2%
	September 2002	51	51	0	100%
Miscellaneous Administrative	July 2002	48	18	30	37.5%
	August 2002	48	18	30	37.5%
	September 2002	48	18	30	37.5%
Interconnection Trunks	July 2002	196	196	0	100%
	August 2002	196	196	0	100%
	September 2002	196	193	3	98.5%
Directory Assistance/Operator Services	July 2002	92	92	0	100%
	August 2002	92	92	0	100%

# OSS Evaluation Project Report – Test Results

Measure Groups	Months	Total Values	Values Validated	Values in Error	Score
	September 2002	92	92	0	100%
Local Number Portability	July 2002	72	34	17	≤76.4%
	August 2002	72	7	5	≤93.1%
	September 2002	72	5	0	≤100%
911	July 2002	40	36	3	≤92.5%
	August 2002	40	36	3	≤92.5%
	September 2002	40	36	3	≤92.5%
Poles, Conduits, and Rights-of-Way	July 2002	22	0	22	0%
	August 2002	22	13	9	59.1%
	September 2002	22	0	19	≤13.6%
Collocation	July 2002	94	94	0	100%
	August 2002	94	94	0	100%
	September 2002	94	94	0	100%
Directory Assistance Database	July 2002	20	20	0	100%
	August 2002	20	20	0	100%
	September 2002	20	20	0	100%
Coordinated Conversions	July 2002	80	60	20	75%
	August 2002	80	41	39	51.3%
	September 2002	80	65	15	81.3%
NXX	July 2002	18	12	0	≤100%
	August 2002	18	12	0	≤100%
	September 2002	18	12	0	≤100%
Bona Fide Requests	July 2002	10	10	0	100%
	August 2002	10	10	0	100%

Directory Assistance/Operator Services	July 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Measure Group was below the 95% benchmark for July 2002 92	92	0	100% n/a
	August 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Measure Group was below the 95% benchmark for August 2002 92	92	0	100% n/a
	September 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Measure Group was below the 95% benchmark for September 2002 92	92	0	100% n/a
Local Number Portability	July 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	72	0	0	≤100%
911	July 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for September 2002			n/a

Directory Assistance/Operator Services	July 2002	92	92	0	100%
	August 2002	92	92	0	100%
	September 2002	92	92	0	100%
Local Number Portability	July 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	72	0	0	≤100%
911	July 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for September 2002			n/a

Measure Groups	Months	Total Values	Values Validated	Values in Error	Score
Directory Assistance/Operator Services	July 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Group was below the 95% benchmark for July 2002	92	0	n/a 100%
	August 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Group was below the 95% benchmark for August 2002	92	0	100% n/a
	September 2002	The score for PMR5-2 for the Directory Assistance/Operator Services Group was below the 95% benchmark for September 2002	92	0	100% n/a
Local Number Portability	July 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	72	0	56	≤22.2%
911	July 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for September 2002			n/a

Measure Groups	Months	Total Values	Values Validated	Values In Error	Score
Directory Assistance/Operator Services	July 2002	92	92	0	100%
	August 2002	92	92	0	100%
	September 2002	92	92	0	100%
Local Number Portability	July 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the Local Number Portability Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	72	0	56	≤22.2%
911	July 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for July 2002			n/a
	August 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for August 2002			n/a
	September 2002	The score for PMR5-2 for the 911 Measure Group was below the 95% benchmark for September 2002			n/a





**Ehr/Fioretti Supplemental Reply Affidavit – Attachment B**

**FIORETTI, SAL (SBC-MSI)**

---

**From:** Morreale, Carla (BearingPoint) [cmorreale@bearingpoint.net]  
**Sent:** Friday, July 18, 2003 4:53 PM  
**To:** Morreale, Carla (BearingPoint); FIORETTI, SAL (SBC-MSI); HICKS, MATT (SBC-MSI); HUDZIK, JOHN (SBC-MSI)  
**Cc:** Eringis, John E (BearingPoint); Quinn, Mary Ann (BearingPoint); Casey, Christopher R (BearingPoint)  
**Subject:** RE: Metrics Reply Comments Language  
**Importance:** High



SBC\_Request\_July  
17 2003.doc ...

All,

Attached, please find the commentary requested by SBC.

Regards,  
Carla

Carla Morreale  
BearingPoint, Inc.  
w 215.405.7325| m 917.841.4921  
cmorreale@bearingpoint.net  
> <<SBC\_Request\_July 17 2003.doc>>

\*\*\*\*\*

The information in this email is confidential and may be legally privileged. Access to this email by anyone other than the intended addressee is unauthorized. If you are not the intended recipient of this message, any review, disclosure, copying, distribution, retention, or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful. If you are not the intended recipient, please reply to or forward a copy of this message to the sender and delete the message, any attachments, and any copies thereof from your system.

\*\*\*\*\*

SBC Midwest contacted BearingPoint on July 17, 2003 regarding performance metrics-related concerns cited in the "Evaluation of the U. S. Department of Justice SBC – Michigan III (July 16, 2003)." SBC articulated concern that the DOJ expressed reservations with SBC Midwest's assertion that, due to the fact that the BearingPoint test is not complete, BearingPoint's findings should be considered interim and "were not sufficient to warrant or to preclude the Commission from evaluating compliance based on the totality of the information before it, including the completed E&Y performance audits." Specifically, SBC Midwest expressed concern that in Footnote 64 the DOJ made the following statement: "Thus, the Department shares CLEC commenters' concerns that SBC is mischaracterizing BearingPoint's processes and its findings."

SBC Midwest stated to BearingPoint that it did not believe that it had mischaracterized BearingPoint's processes or its findings in its related filings. SBC Midwest indicated that statements in its filings were consistent with the letter and spirit of the Michigan Master Test Plan (MTP). SBC Midwest cited the following two factors which it believed supported its position:

1. SBC Midwest indicated that it had based its arguments on the Michigan MTP definitions of Observations and Exceptions which are:

- An Observation will be created if KPMG Consulting (BearingPoint) determines that one of Ameritech's (SBC Midwest's) practices, policies, or system characteristics might result in a negative finding in the final report;
- An Exception will be created if KPMG Consulting (BearingPoint) determines that one of Ameritech's (SBC Midwest's) practices, policies, or system characteristics is not expected to satisfy one or more of the evaluation criteria defined for the test.

whereas it appeared to SBC Midwest that the CLECs and the DOJ based their respective arguments on the following definitions which appear on page 10 of the Executive Summary section of BearingPoint's OSS Evaluation Project Report, dated October 30, 2002:

- An Observation was created if BearingPoint determined that a test indicated one of SBC Ameritech's (SBC Midwest's) practices, policies, or system characteristics might result in a negative finding in the evaluation final report;
- An Exception was created if BearingPoint determined that a test indicated one of SBC Ameritech's (SBC Midwest's) practices, policies, or system characteristics did not satisfy one or more of the evaluation criteria defined for the test.

2. SBC Midwest noted that the definitions of the four possible results for each evaluation criterion, which appear on page 10 of the Executive Summary section of BearingPoint's OSS Evaluation Project Report, dated October 30, 2002, were as follows:

- Satisfied: The norm, benchmark, standard, and/or guideline was met or exceeded
- Not Satisfied: The norm, benchmark, standard, and/or guideline was not met
- Indeterminate: Insufficient evidence has been collected to determine a result
- Not Applicable: The evaluation criteria could not be evaluated

SBC Midwest stated that it felt that the use of the past tense in BearingPoint's October 30, 2002 report with respect to the definitions of Observations and Exceptions and the four possible results as well as its use of the term "final report" may have left the CLECs and, more particularly, the DOJ with the impression that the findings and results cited in BearingPoint's October 30, 2002 reports and subsequent reports were, in fact, a final determination, rather than a interim indication of SBC Midwest's results as of a specific date.

SBC Midwest stated that its arguments regarding the amount of weight it feels should be accorded to E&Y's and BearingPoint's respective findings were based on its reading of the MTP and its understanding

that BearingPoint's findings and/or results may change in the future, in some cases without the need for re-testing.

SBC Midwest requested that BearingPoint provide clarification to the language in the MI MTP and the October 30, 2002 test report so that SBC Midwest can address the DOJ's cited concerns. Based on its discussions with SBC Midwest and subsequent review of the MI MTP, the October 30, 2002 report and the DOJ's July 16, 2003 evaluation, BearingPoint is providing the following statement to SBC Midwest:

*The MTP and the October 30, 2002 Michigan OSS report both refer to the issuance of Observations and Exceptions. In reference to the language regarding Exceptions, the difference in the description is due to the different time periods in which the two documents were issued. The August 14, 2001 MTP language was written to be prospective in nature; and to indicate that one of SBC Midwest's practices, policies, or system characteristics is expected not to satisfy one or more of the evaluation criteria. Once an Exception is issued, SBC Ameritech's research of the issue may reveal one of the following:*

- This issue identified within the Exception may necessitate a change to one or more of SBC Midwest's practices, policies, or systems. BearingPoint would then re-test the issue to validate SBC Midwest's changes. If re-testing was successful, the Exception would be closed and the associated evaluation criterion(a) would receive a positive result.*
- The issue identified within the Exception, in SBC Midwest's opinion, does not warrant a change to any of SBC Midwest's practices, policies, or systems. No re-testing would occur and the result would be Not Satisfied for the associated criterion(a).*
- The issue identified within the Exception was due to a BearingPoint error. BearingPoint would reassess its analysis and if BearingPoint was in agreement that this issue was found to be a BearingPoint error, the Exception would be closed. BearingPoint would then continue with its analysis if necessary.*

*The language in the October 30, 2002 Michigan OSS report was written to indicate the results of the test at that time. Those evaluation criteria that were judged to have not met the specified norm, benchmark, standard, and/or guideline at the analysis deadlines, cited in the October 30, 2002 report, received "Not Satisfied" results. Future re-testing and/or BearingPoint's reassessment of its analysis may have resulted in changes to certain results.*

*In addition, certain issues cited in the data integrity (PMR4) and metrics calculation (PMR5) test reports, identified in Notification Reports, Analysis Reports, and/or Observations, may be satisfactorily addressed by SBC Midwest without requiring re-test activities. Issues addressed in this manner could positively change SBC Midwest's score for an associated evaluation criterion in the PMR4 and PMR5 tests. It is possible that this would also change the result assigned to the evaluation criterion.*



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554**

In the Matter of	)	
	)	
Application by SBC Communications Inc.,	)	
Michigan Bell Telephone Company, and	)	WC Docket No. 03-138
Southwestern Bell Communications Services,	)	
Inc. for Provision of In-Region, InterLATA	)	
Services in Michigan	)	

**SUPPLEMENTAL REPLY AFFIDAVIT OF  
ROBIN M. GLEASON**

**REGARDING MICHIGAN STATE REGULATORY PROCEEDINGS**

**TABLE OF CONTENTS**

<b>SUBJECT</b>	<b>PARAGRAPH</b>
<b>INTRODUCTION</b>	1
<b>PURPOSE OF REPLY AFFIDAVIT</b>	2
<b>CLECA: THE PUBLIC INTEREST ILLUSION</b>	4
<b>TDS METROCOM</b>	9
Future Wholesale Billing Collaborative	9
Contract Dispute	17

I, ROBIN M. GLEASON, being of lawful age, and duly sworn, do hereby depose and state as follows:

**INTRODUCTION**

1. My name is Robin M. Gleason. I am the same Robin M. Gleason who filed affidavits in the WC Docket No. 03-16 proceeding on January 16 and March 4, 2003.<sup>1</sup>

**PURPOSE OF REPLY AFFIDAVIT**

2. The purpose of my Supplemental Reply Affidavit is to respond to certain claims and inaccuracies made by other parties in their affidavits or comments submitted in response to Michigan Bell's § 271 Supplemental Application.
3. More specifically, I address comments made by the Competitive Local Exchange Carriers Association of Michigan, the Small Business Association of Michigan, the Michigan Consumer Federation (herein collectively referred to as "CLECA"), and TDS Metrocom ("TDS") to the extent they raise various allegations which they claim are relevant to the Commission's public interest inquiry. As demonstrated below, none of these claims have anything to do with the public interest requirement in § 271(3)(C).

---

<sup>1</sup> Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, WC Docket No. 03-16 (FCC filed Jan. 16, 2003) ("Initial Application" or "WC Docket 03-16").



## **CLECA: THE PUBLIC INTEREST ILLUSION**

4. CLECA again rehashes old arguments, raising various unsupported claims and allegations regarding irrelevant and outdated retail issues, apparently under the guise of the public interest.<sup>2</sup> The issues raised, however, have absolutely nothing to do with wholesale issues or § 271 public interest requirements.
5. CLECA's comments inexplicably ignore the crux of the relevant question under the § 271 public interest inquiry: whether the local market is open to competitive entry. Instead, CLECA's spectrum of analysis encompasses Michigan Bell's retail profits and prices, its retail term and toll contracts, its retail service quality, and its financial results. None of these retail issues have anything to do with § 271 compliance under either the competitive checklist or the public interest requirements. These unsubstantiated, unsupported retail related allegations are simply outside the scope of a § 271 proceeding.
6. Assuming arguendo that CLECA's arguments were supported by even a scintilla of evidence (which they are not), the Commission clearly cannot expand the public interest review in this § 271 proceeding beyond what is statutorily mandated by the federal Act. Moreover, as the Commission noted in its Memorandum Opinion and Order, Joint Application by BellSouth Corp., et al. for Provision of In-Region, InterLATA Services In Georgia and Louisiana, 17 FCC Rcd 9018 ¶ 305 (2002), the § 271 process could not function as Congress

---

<sup>2</sup> See Comments of the Competitive Local Exchange Carrier Association of Michigan, et al. at 3-8 ("CLECA"), at 8-10 (raising retail service quality issues) and at 14-18 (raising retail pricing, retail financial and retail toll services), Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, WC Docket No. 03-138 (July 2, 2003).